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March 5, 2024

VIA ECF

Honorable Vernon S. Broderick United States District Court Southern District of New York 40 Foley Square New York, NY 10007

> Re: Corrigan v. Catch NYC Inc. et al Civil Action No. 1:23-cv-10586-VSB

Dear Judge Broderick:

Our office represents plaintiff, Richard Corrigan, in the above-captioned matter. We submit this letter jointly with counsel for Defendants, Catch NYC Inc., Doug Spitzer, and Arie Kovant, to seek a stay of this case pending arbitration.

Subsequent to filing the complaint, we discovered that there is a binding arbitration agreement between the parties. The parties will therefore submit the dispute to arbitration, and respectfully requests that the court action be stayed pursuant to the Federal Arbitration Act § 3 (9 U.S.C. §3), which provides that:

"[u]pon being satisfied that the [claim] involved in [the pending] suit or proceeding is referable to arbitration under such an agreement, [the Court] shall on application of one of the parties stay the trial of the action until such arbitration has been had in accordance with the terms of the agreement, providing the applicant for the stay is not in default in proceeding with such arbitration."

Accordingly, we respectfully request a stay until the final adjudication of the parties' arbitration.

Respectfully submitted, /s/ Nicole Grunfeld
Nicole Grunfeld

APPLICATION GRANTED SO ORDERED A J. VERNON S. BRODERICK U.S.D.J.

The parties are directed to file a joint letter noting the status of the arbitration proceedings on June 5, 2024, and every 90 days thereafter. The Clerk of Court is respectfully directed to stay this case.

Dated: March 7, 2024